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DUPLICATE
CC: Docket 96-98

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Memorandum of **Ex Parte** Filing

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: CC Docket Nos 01-338, 96-98 and 98-147

Dear Ms. Dortch.

Pursuant to Section 1.1206 (b)(1) of the Commission's rules Broadview Networks submits the attached written *ex parte* in the above-captioned docketed proceeding. This submission provides additional detail to clarify the difference between Total Service Resale (TSR) and the Unbundled Network Elements – Platform (UNE-P).

Pursuant to Section 1.1206(b)(1), an original and two copies of this filing are provided for inclusion in the public record of the above-referenced proceeding. Please direct any questions regarding this matter to the undersigned at 215-293-8715.

Sincerely,

A handwritten signature in cursive script, appearing to read "Rebecca H. Sommi".

Rebecca H. Sommi

Attachment

Cc Rob Tanner (wiattachment)
Gina Spade (wiattachment)
Jeremy Miller (wiattachment)
Mike Engel (wiattachment)
Aaron Goldberger (wiattachment)
Dan Shiman (wiattachment)
Qualex International

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LINE-P: More Than Just Cost Benefits

1. Consumer Benefit

The Unbundled Network Element – Platform (UNE-P) as it is offered by the Incumbent Local Exchange Carriers (ILEC) today, enables Competitive Carriers (CLECs) to provide unique and innovative service offerings to their customers.

When a CLEC utilizes LINE-P it orders and is billed for the elements it intends to offer to its customers. A CLEC is not restricted by the existing feature packages and/or calling plans that are inherent in the Total Service Resale (TSR) offering.

Differences: Calling Plans

A CLEC receives all usage data on UNE-P; it is not based on the calling plan that the customer had previously chosen from the ILEC. Customers served via TSR must be served via the specific calling plans originally selected from the ILEC which can be comprised of measured usage, flat rate calling and usage allowances. In those instances where a customer has selected a flat rate calling or usage allowance package no usage data is received. This lack of specific calling information for the customer makes it nearly impossible for a CLEC to offer a calling plan that differs from that of the ILEC.

On UNE-P, a CLEC is able to obtain all the usage data so it can offer its own calling package tailored to the customers calling patterns i.e. a CLEC can offer a Flat Rated Service to a customer currently receiving measured service from the ILEC and conversely, Measured Rate Service may be more appropriate for a Flat Rate service customer. The CLEC not only has the option to change the call allowance packages but also the billing associated with the duration of a call. **A** CLEC may choose to round calls to the nearest second versus the nearest minute/three (3) minutes as is experienced on some ILEC calling packages. **A** CLEC can choose to charge for only the time that the customer actually used the service.

Differences: Feature Packages

On UNE-P a CLEC is able to pick and chose the features it wants to market to a customer. It is not restricted by the multi-pack Feature Packages marketed by the ILEC. For example, the ILEC may offer a discounted bundled feature package consisting of five (5) features. however, the customer really only wants three (3) of the five (5) features. UNE-P allow the CLEC to offer only the three (3) features that the customer wanted and in addition allows the CLEC to create their own feature packages.

2. Operational Efficiencies Realized through the Use of UNE-P

LINE-P enables CLECs to provide improved customer service to its end users and facilitates an easier transition to facilities based networks than TSR.

When a CLEC utilizes LINE-P the ordering, provisioning and maintenance of the account are streamlined.

Differences: Number of Universal Service Ordering Codes (USOCs)

When a CLCC places a UNE-P order there are three (3) line class code options i.e. Business, Residential and Additional Lines. No calling plan/allowance package codes are required. When submitting a TSR order there are at least twenty (20) times as many line class code/calling plan options than exist on UNE-P. The increased number of codes creates more complexity from an ordering, provisioning and maintenance perspective.

On UNE-P the CLEC orders the line type and individual features required for the customer. This information is then readily available if a CLEC chooses to transition the customer to UNE-L. The UNE-P customer's service was designed to mirror services the CLEC offers on its own switches; thus, creating an easier transition to UNE-L.